

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED
5-31-16
04:59 PM

Order Instituting Rulemaking to Enhance the
Role of Demand Response in Meeting the State's
Resource Planning Needs and Operational
Requirements.

Rulemaking 13-09-011
(Filed September 19, 2013)

**REPLY COMMENTS OF SAN DIEGO GAS AND ELECTRIC COMPANY (U902E)
ON PROPOSED DECISION OF ALJ HYMES**

Thomas R. Brill

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

8330 Century Park Court

San Diego, CA 92123-1530

Phone: (858) 654-1601

Fax: (858) 654-1878

E-Mail: TBrill@semprautilities.com

May 31, 2016

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	SDG&E’S PROPOSED PILOT IS TO DETERMINE WHETHER DISTRIBUTED STORAGE FACILITIES CAN EFFECTIVELY AND ECONOMICALLY ADDRESS (1) EXCESSIVE EXPORT OF DISTRIBUTED SOLAR TO THE GRID DURING NON-PEAK PERIODS; AND (2) LACK OF FLEXIBLE GENERATION DURING DEMAND RESPONSE EVENTS	1
III.	CONCLUSION.....	3

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Enhance the
Role of Demand Response in Meeting the State's
Resource Planning Needs and Operational
Requirements.

Rulemaking 13-09-011
(Filed September 19, 2013)

**REPLY COMMENTS OF SAN DIEGO GAS AND ELECTRIC COMPANY (U902E)
ON PROPOSED DECISION OF ALJ HYMES**

I. INTRODUCTION

Pursuant to Public Utilities Code §§ 311(d) and 311(e) and in Article 14 of the Commission's Rules of Practice and Procedure, San Diego Gas and Electric Company (SDG&E) hereby submits its reply comments on the proposed decision (PD) of Administrative Law Judge Hymes in the above-entitled proceeding.

II. SDG&E'S PROPOSED PILOT IS TO DETERMINE WHETHER DISTRIBUTED STORAGE FACILITIES CAN EFFECTIVELY AND ECONOMICALLY ADDRESS (1) EXCESSIVE EXPORT OF DISTRIBUTED SOLAR TO THE GRID DURING NON-PEAK PERIODS; AND (2) LACK OF FLEXIBLE GENERATION DURING DEMAND RESPONSE EVENTS

In its Comments, the California Large Energy Consumers Association (CLECA) expresses a concern that one of the purposes of SDG&E's over-generation pilot is to address open issues around multiple uses of storage in other proceedings. CLECA states that, "SDG&E...states that a purpose of its pilot is to examine the multiple use case of demand charge management for retail purposes plus addressing over-generation in the wholesale market."¹ SDG&E has no intention of using this pilot to address open policy issues in Rulemaking (R.)15-

¹ See CLECA Comments, at p. 4.

03-011 or any other proceeding dealing with multiple use issues for storage resources. As described on p. 47 of SDG&E's original filing, "[t]he objective of SDG&E's proposed pilot is to determine whether distributed storage facilities can effectively and economically address two major concerns associated with renewable over-generation: (1) excessive export of distributed solar to the grid during non-peak periods; and (2) lack of flexible generation during demand response events."

SDG&E's pilot design does contemplate the use of the storage for demand side management (DSM) during non-DR months as well. However, the purpose of allowing the storage unit to be used in this way is solely to create a potential economic incentive for customers to participate in the pilot program. This fact does not impact whether or not the pilot achieves its intended purposes, which is to address over generation issues and add flexible resources during the DR season. It is also important to note that the pilot program is targeted to serve a very small number of customers and will not be bid into the CAISO market at this time, both of which detract from the possibility that any results from this pilot could be considered precedent setting for issues involving multiple uses for storage products.

///

///

///

III. CONCLUSION

SDG&E appreciates the opportunity to submit the forgoing reply comments.

Dated: May 31, 2016

San Diego Gas & Electric Company

/s/ Thomas R. Brill

By: Thomas R. Brill

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

8330 Century Park Court

San Diego, CA 92123-1530

Telephone: (858) 654-1601

Facsimile: (858) 654-1878

E-mail: TBrill@semptrautilities.com